

## KEZHAYA LAW PLC

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March 23, 2020

Mr. David Alan Johnson

By email only to [somedavidjohnson@gmail.com](mailto:somedavidjohnson@gmail.com)

Re: Demand letter – misappropriation of [facebook.com/TheSatanicTempleWashington](https://facebook.com/TheSatanicTempleWashington)

Mr. Johnson,

I represent The Satanic Temple in a budding dispute surrounding the misappropriation of the facebook.com webpage located at the URL [facebook.com/TheSatanicTempleWashington](https://facebook.com/TheSatanicTempleWashington). As you may know, United Federation of Churches LLC (dba “The Satanic Temple” and abbreviated “TST”) holds the exclusive rights to the name “The Satanic Temple” and the contents of the TST-Washington website.

My understanding is that you were, until recently, responsible for managing social media for the Washington Chapter of TST. It is legally irrelevant whatever caused that change, but shortly thereafter you and a group in tandem with you misappropriated TST’s website and its contents. To my understanding, you have also removed the approved administrators from and replaced them with yourself and possibly others. You then renamed the website “Archived Temple Chapter” and have been posting content under the guise of creating a new organization.

By hijacking my client’s copyrights to the content and trademark rights to the name, my client is entitled to substantial statutory damages from you and all who have acted in tandem with you. For example, a copyright infringement case entitles my client to a minimum of \$750 and up to \$150,000 if the Court finds the infringement is willful. 17 USC § 504(c). A trademark infringement case entitles my client to a minimum of \$1,000 and up to \$100,000. 15 USC § 1117(d). In addition to monetary damages, my client is entitled to costs and attorneys fees and an order for you to permanently return full control of the above facebook page.

I am authorized and ordered to initiate litigation if you do not permanently relinquish full control of the above facebook page by 4:00 PM Central Time on March 24, 2020.

Sincerely,



Matthew A. Kezhaya